## Enodis Ice Group

Scotsman

OICE o-Matic

775 Corporate Woods Parkway Vernon Hills, IL 60061

December 14, 2004

Docket No. 04-AAER-1 Docket Office California Energy Commission 1516 Ninth Street, Mail Station 4 Sacramento, California 95814-5512 DOCKET
04-AAEAA

DATE DEC 14 2004
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Subject: Docket No. 04-AAER-1

Dear Commissioner,

We would like to take this opportunity to thank the California Energy Commission for incorporating the input we recommended relative to commercial ice machine energy consumption limits in the latest Appliance Efficiency Regulations. We appreciated the opportunity to collaborate in developing a standard that reduces the energy requirement in the State of California and did not cause adverse impact to the state or our industry.

Our project as presented to you has been fully approved by our board and we have started the execution of that project. We fully expect to be completely compliant by the 1/1/2008 effectivity date.

We were excited by the interest that the Commission had in the step change in energy efficiency that can be achieved through the use of nugget machines. We intend to work proactively within the State of California to leverage the benefit of nugget type ice machines. You may recall from our presentation given at the October hearing and the presentation submitted for the November hearing that these types of machines offer a 35% advantage over comparable cube type ice machines. The attached chart shows this graphically. We have also done studies that show customers prefer this type of ice over cube ice in many applications such as soft drinks.

We have initiated work with the Foodservice Technology Center to obtain independent third party data to substantiate the claims with respect to flake and nugget machines. We have provided equipment to them and are working with them to define the test program.

We also have a marketing program underway with Pacific Gas & Electric Company as well as Southern California Edison to provide incentives for nugget machines. If you have any other ideas on how to stimulate the adoption of nugget machine technology, please let us know.

We would like to be proactive in understanding any further regulations the CEC may consider with respect to commercial ice machines beyond 2008. We have the leading global share on the market and are committed to energy efficiency. Moving significantly beyond the 2008 standard will require technology that is not yet developed in our industry. For this reason we think that close collaboration will be necessary to assure that any further standards are technically possible to achieve.

Again, thank you for your consideration in developing the current standard and we look forward to further joint efforts in the future.

Sincerely,

Matt Allison

Vice President of Engineering

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Ice O Matic

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ICE-O-Matic Manitowoc Scotsman Hoshizaki Cornelius -CA-Stds 1600 ×× 1400 1200 1000 Ice Making Capacity (Ibs/24 hrs) ××₄ 800 900 400 200 0 2.0 11.0 12.0 10.0 8.0 3.0 9.0 7.0 6.0 5.0 4.0 Energy Consumption (kWh/100 lbs)

Air-Cooled Ice Machines Energy Consumption vs. Capacity

## Document Management Form (Revised 4/29/04)

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04-AAER-1

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